

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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YI XIANG, Individually and on Behalf of All : Civil Action No. 1:16-cv-04923-VM-KNF  
Others Similarly Situated, : **(Consolidated)**  
Plaintiff, : CLASS ACTION  
vs. : LEAD PLAINTIFF'S NOTICE OF MOTION  
INOVALON HOLDINGS, INC., KEITH R. : AND MOTION FOR PRELIMINARY  
DUNLEAVY, THOMAS R. KLOSTER, : APPROVAL OF SETTLEMENT  
DENISE K. FLETCHER, ANDRÉ S. :  
HOFFMANN, LEE D. ROBERTS, WILLIAM :  
J. TEUBER JR., GOLDMAN SACHS & CO., :  
MORGAN STANLEY & CO. LLC, :  
CITIGROUP GLOBAL MARKETS INC., :  
MERRILL LYNCH, PIERCE, FENNER & :  
SMITH, INCORPORATED and UBS :  
SECURITIES LLC, :  
Defendants. :  
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TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, Stipulation of Settlement with exhibits, and Declaration of Michael Joaquin, as well as all prior pleadings and proceedings had herein, Lead Plaintiff Roofers Local No. 149 Pension Fund, by and through its attorneys, will move this Court, before the Honorable Victor Marrero, United States District Judge for the Southern District of New York, in Courtroom 11B, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and time designated by this Court, for entry of the [Proposed] Order Preliminarily Approving Settlement and Providing for Notice, agreed upon by all parties: (1) granting preliminary approval of the proposed settlement; (2)

approving the form and manner of notice of the proposed settlement to the Class; and (3) setting a hearing date for final approval thereof, and a schedule for various deadlines relevant thereto.

DATED: March 6, 2019

Respectfully submitted,

ROBBINS GELLER RUDMAN  
& DOWD LLP  
SHAWN A. WILLIAMS  
DANIEL J. PFEFFERBAUM  
JOHN H. GEORGE

s/Daniel J. Pfefferbaum

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DANIEL J. PFEFFERBAUM

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Additional Counsel for Lead Plaintiff

## CERTIFICATE OF SERVICE

I, Daniel J. Pfefferbaum, hereby certify that on March 6, 2019, I authorized a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filing to all counsel registered to receive such notice. I further certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 6, 2019, at San Francisco, California.

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s/ Daniel J. Pfefferbaum  
DANIEL J. PFEFFERBAUM